

**REMARKS**

Claims 15-22 are pending in this application. By this Amendment, claim 15 is amended to even more clearly distinguish over the applied references. Support for the amendment to claim 15 can be found in the specification, for example, on page 11, line 18 - page 12, line 9. No new matter is added.

Applicants appreciate the courtesies shown to Applicants' representative by Examiner Tran in the December 3, 2008 personal interview. Applicants' separate record of the substance of the interview is incorporated into the following remarks.

The Office Action objects to claim 15 for informalities. Applicants have amended claim 15 to correct the informalities, as suggested by the Office Action. Accordingly, withdrawal of the objection is respectfully requested.

The Office Action rejects claims 15, 16, 18, 19, 21 and 22 under 35 U.S.C. §102(b) over JP 06-308576 to Sunao. The rejection is respectfully traversed.

As agreed during the personal interview, Sunao fails to disclose a shutter unit that houses a plurality of shutter blades, wherein all of the shutter blades are disposed between a lens-side frame and an image pick-up unit-side frame, a portion of the image pick-up unit that opposes the shutter unit is located between all of the shutter blades and the photoelectric converter when all of the shutter blades are in extended positions to block light from reaching the photoelectric converter, and protruding into the second opening part of the image pick-up unit-side frame, as recited in independent claim 15.

The Office Action alleges that the shutter 2, shutter curtains 2a, and converter 30 of Sunao correspond to the claimed shutter unit, plurality of shutter blades, and photoelectric converter, respectively. The Office Action also alleges that the holder 19 and the image sensor 30 of Sunao, combined, correspond to the claimed image pick-up unit. In addition, the Office Action, citing Fig. 8 of Sunao, alleges that a portion of the holder 19 (part of the

alleged image pick-up unit) opposes the shutter (the alleged shutter unit) and is located between all of the shutter curtains 2a (the alleged plurality of shutter blades) and the image sensor 30 (the alleged photoelectric converter), as recited in independent claim 15.

Applicants respectfully disagree.

In particular, Sunao fails to disclose that a portion of the alleged holder 19 (part of the alleged image pick-up unit) opposes the shutter 2 (the alleged shutter unit) and is located between all of the shutter curtains 2a (the alleged plurality of shutter blades) and the image sensor 30 (the alleged photoelectric converter) when all of the shutter curtains 2a are in extended positions to block light from reaching the image sensor 30. Figs. 5 and 8 of Sunao clearly show that the shutter 2 is not capable of blocking light from reaching the image sensor 30 (the alleged photoelectric converter) because the front face of the light filter group 18 protrudes into the shutter 2 and thus prevents the shutter curtains 2a from extending to a position that blocks light from reaching the image sensor 30. Therefore, the front portion of the holder 19 (the alleged portion of an image pick-up unit that opposes a shutter unit) is not located between all of the shutter curtains 2a (the alleged plurality of shutter blades) and the image sensor 30 (the alleged photoelectric converter) when all of the shutter curtains 2a are in extended positions to block light from reaching the image sensor 30. Thus, Sunao fails to disclose all the features of independent claim 15.

Therefore, independent claim 15 is patentable over Sunao. In addition, claims 16, 18, 19, 21 and 22, which depend from independent claim 15, also are patentable over Sunao for at least the reasons independent claim 15 is patentable, as well as for the additional features these claims recite. Accordingly, withdrawal of the rejection is respectfully requested.

The Office Action rejects claim 17 under 35 U.S.C. §103(a) over Sunao in view of JP 07 098481 to Shosuke; and rejects claim 20 under 35 U.S.C. §103(a) over Sunao in view of U.S. Patent No. 5,483,284 to Ishiguro. These rejections are respectfully traversed.

As agreed during the personal interview, Shosuke and Ishiguro do not overcome the deficiencies in Sunao with respect to claim 15. Further, and as discussed above, Sunao does not disclose all of the features of claim 15. Therefore, claims 17 and 20 also are patentable over Sunao, for at least the reasons independent claim 15 is patentable. Accordingly, withdrawal of the rejections is respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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Attachment:

Petition for Extension of Time

Date: December 4, 2008

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